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SUPERVISION OF COTTONSEED SAMPLING

Under regulations governing inspection, sampling, and certification of cottonseed sold or offered for sale for crushing purposes.

(This first outline will be revised, if necessary, in the light of a season's experience with it. Recommendations for revisions should be submitted not later than March, 1945.)

The Sample

- l. The gross or original sample should consist of not less than two pounds for each ton of cottonseed in the shipment. It would be better to have too large a sample than too small a sample. In sampling truck loads, the trier should be inserted in three or four places in each truck. The number of probes will be governed to some extent by the size of the truck and the size of the trier, remembering that not less than two pounds per ton must be taken.
- 2. Receptacles for the gross samples should not be kept in the sunlight and should never be left uncovered.
- 3. The gross samples should never be "struck off" to a constant weight since the residue may not be representative.
- 4. The official sample should weigh not less than two pounds. Less than two pounds is not sufficient for a proper analysis and re-analysis on appeal.

Suggested Supervision Procedure

- 1. Study the regulations and learn procedures and equipment required for sampling.
- 2. On visits to mills stop in mill office and call on the mill manager. If the manager is not available, state the purpose of the visit to the man in charge. It is usually a good idea to look up the superintendent when going into the mill, particularly if the manager is not available.
- 3. Witness and check all phases of sampling being done by the licensed samplers and/or their assistants at the time of the visit, including the use of triers or scoops in truck, wagon and car-lot shipments.

- 4. Check the handling of samples while being drawn and after they are drawn. Be sure that proper containers are available and in use.
- 5. Check procedures of drawing, preparing, and handling of samples and make corrections and suggestions for improvement in order to obtain more accurate and representative samples.
- 6. Check the cleaning of the bulk samples over shaker and the reducing of the bulk sample. If sample is mechanically mixed after being cleaned, be sure that mixing is done properly and that the sample to be sent to the chemist is properly taken from the mixer. The official sample to be sent to the chemist for analysis should be checked and it must be stressed that the sample weigh approximately 2 pounds or that the sample container be filled, allowing only enough space for the adequate tight closing of the container for shipment. A 2 pound sample is necessary in order to allow for a re-check by the chemist if something goes wrong or for an official appeal if such is requested.
- 7. Check the methods of reporting foreign matter content of the gross samples. Be sure that proper scales are used for weighing. Gross weight of original sample must be reported on sampler's certificate, as well as the weight of the cleaned seed or the weight of the foreign matter. If the foreign matter is not weighed, the cleaned seed should be weighed before being mixed. Be sure that the weighing is done accurately.
- 8. Be sure that the gross or original sample is not struck off to any fixed weight such as 50 pounds. Point out to samplers and their assistants the hazards of such a practice, i.e., that the portion eliminated may not be representative of the average quality of the sample as a whole, that there is a tendency for certain types of foreign matter to sift to the bottom, that the seed on top may be more dry than those at the bottom, etc.
- "9. Check the condition of all containers used by samplers for handling the bulk samples and for sending the official samples to chemists for analysis.
- 10. Check the execution of the sampler's certificates on official samples and see that all necessary data appear thereon.
- ll. At the beginning of the season make a report giving a list of all equipment in use by the licensed samplers and their assistants at each mill visited. Indicate the condition of the equipment. Recommend replacements whenever necessary. If any deficiencies are noted, subsequent reports should indicate among other things any new items of equipment that have been provided since the preceding report, and any continued deficiencies. All reports throughout the season should include a brief statement on matters of general interest observed in connection with the cottonseed work.

- 12. If sampling is not being done correctly then the correct procedure should be demonstrated. This will mean the actual taking of a few samples from trucks and/or cars. This should go a long way toward correcting deviations from proper sampling methods. (If important changes are recommended, a reinspection should be made at the earliest practicable date).
- 13. Discuss recommendations with mill management before leaving the mill. Try to answer any and all questions that may be asked by samplers, managers and others relative to the drawing and preparation of samples. In some instances mill managers may raise questions involving difficulties with sellers of seed and the like that cannot be answered. In such instances make notes of the inquiries and refer them to the Area Managers for clearance to Mr. Doughtie.

Endeavor to keep informed on the variations in the grades of cottonseed in different localities as well as the probable causes for such variations, such as moisture, low or high foreign matter content, free fatty acid and oil and ammonia variations. A supervisor need not be a chemist in order to discuss certain variations which may be disclosed by data in the grade certificates, or to calculate grades from a given set of figures. At times mill managers as well as sellers of seed may bring up points that can be adequately clarified by a simple explanation of facts and figures. Oftentimes if supervisors will stress the careful handling of seed by farmers, ginners and others before the seed reach the mills, very good results may be obtained.

- 14. Inspections should be made of the sampling procedure at each mill where licensed samplers are stationed, at intervals of about three weeks, or in any event at not less than monthly intervals during the active season. Even though it may be felt that the work is being done with a high degree of efficiency at certain mills, frequent inspections should serve to keep the samplers on the alert.
- 15. Supervision reports. Four copies of each inspection report will be made—one copy for the mill manager, one for the samplers, one for the Area Manager, and one for the Memphis supervision office (Mr. Doughtie). If desired, an additional copy may be made and retained by the fieldman. Should the fieldman wish to make any confidential comments in his report such comments may be added at the bottom of the copies which he will mail to the Area Manager and to Mr. Doughtie. The report forms now available may be used until they are exhausted but when it becomes necessary to run off new supplies modifications may be agreed upon between Mr. Doughtie and the Area Managers.
- 16. Follow-up on Supervision Reports. Correspondence with mill managers and samplers relative to the supervision of sampling will be carried on by Area Managers and copies sent to Mr. Doughtie. If Mr. Doughtie notes any points that he wishes to have raised with the mill managers or samplers he will so advise the Area Manager and the latter will deal with them by correspondence or through appropriate

instructions to the fieldmen, as may be required, sending Mr. Doughtie copies of the correspondence. In cases of emergency or where required by direct inquiry from a mill, Mr. Doughtie may communicate directly with mill managers and/or samplers. Copies of such communications will be sent to Washington and to the Area Manager. In view of the complexities involved, however, Area Managers should take up with Mr. Doughtie, Mr. Meloy, or Mr. Finch, as circumstances seem to require, any questions involving interpretations of the regulations or other doubtful questions before taking definite positions on them.

- 17. Procedure in disciplinary cases involving licensed samplers.

 (a) Minor deviations from the sampling instructions may be taken care of as indicated above by cautioning the samplers, drawing the situation to the attention of the mill management, and leaving copies of the supervision reports with them.
- (b) As to more serious cases—the regulations provide in part that the failure or refusal of any licensed cottonseed sampler to draw, prepare, identify, and forward official samples in accordance with the regulations may be cause for the suspension or revocation of his license; and that pending final action a sampler's license may be suspended whenever such action shall be deemed to be for the good of the service.

In the more serious cases, the infractions will be drawn to the attention of the sampler and the mill manager, with the statement that the facts will be reported through channels for appropriate action.

In the absence of extremely aggravated circumstances, the supervisor will not say that he will recommend suspension, even though he may intend to do so. Each serious case should be separately treated and a separate report by letter (briginal and two carbon copies) should be submitted to the Area Manageral: The report should include the name of the sampler and the name and address of the mill by which he is employed, and should contain a complete statement of the facts and the supervisor's recommendation. The substance of conversations with the sampler and the mill manager should be given and all circumstances involved should be fully described. When the Area Manager receives such a report he will submit the original and one carbon copy and any accompanying papers to Mr. Doughtie with his recommendation. Mr. Doughtie will transmit the report and recommendation to Washington with his own recommendation and any observations he may wish to add. After a decision is reached in " Washington, the Area Manager and the Memphis supervision office will be informed of the action taken.

In urgent and aggravated cases the supervisor (fieldman) may make a brief but complete report and recommendation by wire, day or night letter, to the Area Manager for appropriate clearance by him through Memphis to Washington or directly to Washington if considered advisable.

We are hopeful of course that supervision will be so effective that few if any suspensions of licenses will be required.

18. While responsibility for the supervision of cottonseed sampling and for cottonseed market news has been assigned to the Area Managers, close cooperation between them and the Memphis supervision office will be necessary.

Mr. Doughtie will work out with Area Managers a procedure for checking, perhaps weekly; a representative cross-section of the certificates issued by each licensed chemist in order to determine the accuracy of their calculations.

